

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

Civil Action No. 24-CV-12586

RUSSELL ARAMAND, a/k/a
“Saitamaguru1”;
MAXWELL HERNANDEZ, a/k/a
“MaxEquation”;
MANPREET SINGH KOHLI, a/k/a “Mkay
Saitama,” a/k/a “mannythehitman”; and
NAM TRAN, a/k/a “Ntran1234,”

Defendants.

CERTIFICATION OF RELATEDNESS

Plaintiff Securities and Exchange Commission (the “Commission”) respectfully states that pursuant to Local Rule 40.1(g)(2)(A), the above-captioned matter should be designated by the Clerk as related to the following previously filed criminal cases: *United States v. Russell Armand*, 24-cr-10014 (AK) and *United States v. Maxwell Hernandez*, Crim. No. 23-10135 (AK).

Armand pleaded guilty to violations of 18 U.S.C. § 371 (conspiracy to commit wire fraud and to conduct an unlicensed money transmitting business) and 15 U.S.C. §§ 78i(a)(2) and 78ff(a) (market manipulation). Hernandez pleaded guilty to the same statutory charges. In the above-captioned matter, the Commission seeks injunctive relief, equitable relief, and civil monetary penalties against these defendants (and others) for conduct that relates to the previously filed criminal cases, including an alleged scheme to manipulate the market for “Saitama Inu” and “SaitaRealty,” two crypto assets that were offered and sold as securities.

Dated: October 9, 2024

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION,

By its attorneys,

/s/ David J. D'Addio

David J. D'Addio (Mass. Bar No. 665790)

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Certificate of Service

I, David J. D'Addio, certify that on October 9, 2024, I filed the foregoing motion electronically with the Court. The filing will be sent to the registered participants as identified on the Notice of Electronic Filing and may also be accessed through the Court's ECF system. I have further caused the foregoing motion to be sent by email to counsel for Defendants Armand (Scott Lauer, Esq.) and Hernandez (Daniel Hutchinson, Esq. and Daniel Tarlow, Esq.).

/s/ David J. D'Addio

David J. D'Addio